

EXHIBIT A

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,
Debtors.¹

PROMESA
Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**[PROPOSED] ORDER GRANTING URGENT MOTION OF AMBAC ASSURANCE
CORPORATION AND FINANCIAL GUARANTY INSURANCE COMPANY TO
COMPEL DISCOVERY FROM THE GOVERNMENT PARTIES IN CONNECTION
WITH THE DISCLOSURE STATEMENT**

Upon consideration of the *Urgent Motion of Ambac Assurance Corporation and Financial Guaranty Insurance Company to Compel Discovery from the Government Parties in Connection with the Disclosure Statement* (the “Urgent Motion”),² the relevant portions of the docket, and being otherwise fully advised in the matter; and the Court having jurisdiction over this matter under 28 U.S.C. § 1331 and PROMESA § 306(a), 48 U.S.C. § 2166(a); and venue being proper under 28 U.S.C. § 1391(b) and PROMESA § 307(a), 48 U.S.C. § 2167(a); and due and proper notice of the Urgent Motion having been provided, and it appearing that no other or further notice

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801).

² Capitalized terms not defined herein have the meanings ascribed to them in the Urgent Motion.

need be provided; and the Court having determined that the legal and factual bases set forth in the Urgent Motion establish just cause for the relief granted herein; and upon all of the proceedings had before the Court and after due deliberation and sufficient cause appearing therefore, the Court hereby ALLOWS the Urgent Motion and ORDERS THAT:

1. The Urgent Motion is GRANTED as set forth herein.
2. The Government Parties are ordered to produce documents responsive to the Requests for Production by no later than June 10, 2021, and to produce witnesses in response to the Deposition Cross-Notices no later than June 14, 2021.
3. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.
4. The Court shall retain jurisdiction to hear and determine all matters arising from or relating to the implementation, interpretation, or enforcement of this Order.
5. This Order resolves Docket Entry No. ___ in Case No. 17-BK-3283-LTS.

Dated: _____, 2021
San Juan, Puerto Rico

Laura Taylor Swain
United States District Court Judge